

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 1:20-cv-00954-UA-JLW

FARHAD AZIMA, )  
)  
Plaintiff, )  
)  
v. )  
)  
NICHOLAS DEL ROSSO and )  
VITAL MANAGEMENT )  
SERVICES, INC., )  
)  
Defendants. )

**DECLARATION OF  
BRANDON S. NEUMAN  
IN SUPPORT OF DEFENDANTS'  
MOTION TO FOR  
CLARIFICATION**

I, **Brandon S. Neuman**, do hereby declare under penalty of perjury the following:

1. I am a partner of the law firm of Nelson Mullins Riley & Scarborough LLP ("Nelson Mullins"), 301 Hillsborough Street, Suite 1400, Raleigh, North Carolina 27603. I am a member in good standing of the Bars of the State of North Carolina, the State of California, and of this Court. Nelson Mullins is counsel to Defendants Nicholas Del Rosso and Vital Management Services, Inc., in this matter.

2. I attach hereto as **Exhibit A** a true and correct copy of Plaintiff's Nov. 2, 2022 Document Request.

3. I attach hereto as **Exhibit B** a true and correct copy of correspondence from counsel for Plaintiff regarding deposition of Mr. del Rosso.

4. I attach hereto as **Exhibit C** a true and correct copy of correspondence from counsel for Plaintiff dated June 7, 2023, regarding Azima's cancellation of his deposition.

5. I attach hereto as **Exhibit D** a true and correct copy of Defendants' correspondence to counsel for Plaintiff dated June 8, 2023, regarding Plaintiff's incomplete discovery.

6. I attach hereto as **Exhibit E** a true and correct copy of correspondence received from counsel for Plaintiff on August 7, 2023 relating to Mr. del Rosso's deposition.

7. I attach hereto as **Exhibit F** a true and correct copy of correspondence from Defendants to counsel for Plaintiff regarding Plaintiff's use of a document marked "attorney-client privilege" and "work product" in connection with Mr. del Rosso's deposition.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on August 8, 2023 in Raleigh, North Carolina.

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

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Brandon S. Neuman

## CERTIFICATE OF SERVICE

I hereby certify that on this 8<sup>th</sup> day of August 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send electronic notification of filing to the following:

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